

## **Canada has a *National Action Plan to Combat Human Trafficking*.**

In line with internationally accepted best practices, outlined in the Trafficking Protocol, Canada focuses on four core areas, known as the Four Pillars (the 4-Ps):

- The prevention of human trafficking;
- The protection of victims;
- The prosecution of offenders; and
- Working in partnership with others both domestically and internationally.

### Detection, Investigation and Prosecution of Traffickers

- The *Criminal Code of Canada (Criminal Code)* contains the tools to hold traffickers accountable - Canadian Anti-Trafficking Legislation (Section 279.01-279.04), and contains measures designed to make testifying less traumatic for victims and other vulnerable witnesses;
- Immigration and Refugee Protection Act (Section 118).

### BILL C-423 – Modern Slavery Act

An Act respecting the fight against certain forms of modern slavery through the imposition of certain measures and amending the Customs Tariff.

- Imposes an obligation to report on the measures taken to prevent and reduce the risk that forced labour or child labour is used at any step in the manufacture, production, growing, extraction or processing of goods in Canada ;
- Amends the *Customs Tariff* to allow for a prohibition on importation of goods manufactured or produced wholly or in part by forced labour or child labour; and
- Modern Slavery Act - comes into force on January 1, 2020

# Modern Slavery Statement 2019/20



## UK Modern Slavery Act 2015

Under the UK Act Busy Bees are committed to publish an annual Slavery and Human Trafficking Statement setting out the steps the company has taken and is taking to ensure that slavery and human trafficking is not taking place in our business or supply chain.

### About Busy Bees

As a leading childcare provider founded in 1983, we insist on upholding the highest standards and ethics at every level of our business and in every country where we have business interests, irrespective of local practices.

We are committed to acting with integrity, honesty, transparency and fairness at all times, to uphold our ethical standards and to protect our reputation. Our Modern Slavery Policy represents our intention to act with integrity and our commitment to do what is right.

This means that anyone working for or on behalf of Busy Bees or in partnership, providing services or resources, must abide by this policy. Busy Bees will only work with suppliers with the same ethical approach and standards we apply to our own organisation to ensure the same level of protection is afforded to employees of our contractors, suppliers and third-party partners.

We demand that all contractors and supply chains adhere to our operating guidelines which sets out our business, legal and ethical standards in respect to occupational health and safety, fair wages and benefits, work hours, transparent, freedom of association, sub-contracting, product safety, anti-bribery and environmental sustainability. Busy Bees does not and will not knowingly work with those who use child labour, forced labour, discrimination or harassment and requires all suppliers to prohibit slave labour and to prevent practices that may contribute to human trafficking.

Our robust policies and procedures, values and behaviours contribute to eliminating any opportunity for slavery to arise in our direct business. We commit to uphold the highest of standards for our own employees and to carry out due diligence to ensure our suppliers, agencies and third-parties adhere to our ethics and values.

To take steps to ensure that modern slavery is not taking place in our supply chain we commit to:

- Only work with contractors and suppliers who commit to working within our operating guidelines
- Ensure that contracts and Service Level Agreement incorporate expectations regarding slavery
- Use recognised accredited suppliers where possible
- Audit suppliers and supply chains to ensure compliance with our operating guidelines and modern slavery policy
- Provide training for suppliers, contractors and supply chain on the prevention of slave labour and human trafficking

### Our Vision

To give every child the best start in life

### Our Mission

Deliver high quality childcare and exciting opportunities for learning that give every child a head start as they prepare for school

### Our Core Values

#### Care

We take care very seriously

#### Service

We are an integral part of parents' support network

#### Quality

We set and maintain the highest standards, it's what children and parents deserve

#### Value

We ensure that we provide outstanding value for money

# Modern Slavery Policy



## Who does this policy apply to?

This policy applies to the Board, senior executives, employees of Busy Bees, suppliers, contractors, third-parties and Joint Venture partnerships.

### As a Global business we recognise that slavery is a very real problem, especially in territories that have:

- Migrant labour (country to country or within a country)
- A high presence of vulnerable populations (such as refugees or ethnic minorities)
- Young workers and risk of child labour
- Contract, agency and temporary workers
- Outsourced human resources functions

### The following key principles apply to Busy Bees, its partners and supply chain:

- Compensation and benefits must comply with local laws relating to minimum wage, overtime hours and other benefits
- Passports, visas and other personal documentation should not be taken from employees
- Any form of debt bondage is prohibited

Workers will not be subject to contracts that tie them into repaying a loan, excessive accommodation expenses or other costs.

### Under no circumstances should Busy Bees engage in any business where:

- Prison labour or child labour or any form of forced or compulsory labour is used
- Workers must be free to leave employment or work after reasonable notice

As required by the Modern Slavery Act 2015, Busy Bees will publish on an annual basis a modern slavery transparency statement which will set out our approach to preventing

slavery and human trafficking within our business.

### Whistleblowing/Speak UP

Busy Bees is committed to implementing and enforcing effective systems and controls to ensure slavery is not taking place anywhere in its business or in its supply chain. Such controls vary by territory, but may include: slavery policies and procedures, training, risk assessments, supply chain due diligence, whistleblowing policies and contractual controls.

Busy Bees sub-contractors, consultants and suppliers are expected to maintain effective systems and controls to ensure slavery is not connected to their supplies and services to Busy Bees.

These will include but are not restricted to staffing agencies, suppliers of resources, outsourced services for catering, cleaning and uniform. Also be mindful of corporate hospitality.

Busy Bees will only use agreed specified reputable recruitment agencies. We thoroughly check recruitment agencies before adding them to our list of approved agencies, where we may undertake the following:

- Conduct background checks
- Investigate reputation
- Ensure the staff an agency provides have the appropriate paperwork
- Ensure that the agency provides assurances that the appropriate checks have been made on the person they are supplying

We keep agents on the list under regular review.

### General Recruitment

Busy Bees ensures that staff have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work, and that staff are legally able to work in the country in question. We also check the names and addresses of our staff (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited). We also provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

### Identifying Slavery or Trafficking

There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a slavery or trafficking victim, namely where the person:

- Is not in possession of their own passport, identification or travel documents
- Is acting as though they are being instructed or coached by someone else
- Allows others to speak for them when spoken to directly
- Is dropped off and collected from work
- Is withdrawn or they appear frightened
- Does not seem to be able to contact friends or family freely
- Has limited social interaction or contact with people outside their immediate environment



# Modern Slavery Policy



This list is not exhaustive. Bear in mind that, a person may display a number of the indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.

## Reporting Concerns

Talking to someone about your concerns may stop someone else from being exploited or abused. Employees, subcontractors, consultants and suppliers receive training on recognising the signs of slavery and how to report their concerns if they believe or know of slavery exists in or being connected to Busy Bees business or supply chain.

It is required that any suspicions are reported to the country CEO, who will bring it to the attention of the Global CEO and the main Board.

If you think that someone is in immediate danger, contact the emergency services. Not all victims may want to be helped and there may be instances where reporting a suspicion puts the potential victim at risk, so it is important that, in the absence of an immediate danger, you discuss your concerns first with the country CEO before taking any further action. Busy Bees encourages everyone to keep their eyes and ears open and to speak up if you think there is more we can do to prevent slavery.

## Policies

To reduce slavery, Busy Bees has a clear framework of policies and expected behaviours which are reviewed annually to ensure that our core values are reflected in each Busy Bees Centre and business activity, these include:

- **Speak Up** which provides an avenue for staff, suppliers and agency workers to report any concerns relating to wrongdoing or malpractice in the organisation including suspicion of modern slavery practices
- **Code of Conduct** this underpins all of our company activity and behaviours, it applies to all employees of Busy Bees wherever they are located in the world
- **Safer Recruitment** sets out our mandatory procedure for staff recruitment including background checks, declarations, and standards for compliance with local legislation
- **Human Rights Policy**
  - Whistleblowing Policy
  - Health and Safety Policy
  - Supplier Code of Conduct
  - Recruitment and agency workers standards

All contribute to reducing the potential of modern slavery in our business and associated supplier chain.

